

FILED

SEP - 6 2017

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. S1-4:17CR132 JAR
)	
DEVONTE HOLLIDAY and)	
ANTHONY HAYES,)	
)	
Defendants.)	

SUPERSEDING INDICTMENT

COUNT I – CONSPIRACY

The Grand Jury charges that:

The Members of the Conspiracy

1. The members of the conspiracy were the Defendants Devonte Holliday and Anthony Hayes and at least twelve other individuals, known and unknown, all hailing from the Chicago, Illinois area.

The Agreement

2. It was the object of the conspiracy to commit a “smash and grab” theft of luxury handbags in St. Louis County, Missouri within the Eastern District of Missouri.
3. It was a further object of the conspiracy to take the stolen merchandise from the Eastern District of Missouri to Chicago to be resold.

Overt Acts

4. On or about October 27, 2016, a Nissan Rogue bearing Illinois license E795677 (the “Nissan Rogue”) was rented from a car rental agency at Midway Airport in the Northern District of Illinois by an individual purportedly with the initials R.L.
5. On or about November 11, 2016, a red Dodge Journey bearing Indiana license FL306AAX (the “Dodge Journey”) was rented from a rental concession at Midway Airport in the Northern District of Illinois by an individual purportedly with the initials K.M.
6. On or about the evening of November 25, 2016 or the early morning hours of November 26, 2016, members of the conspiracy met in Chicago, Illinois and recruited a total of fourteen individuals including the Defendants to travel from Chicago to the Eastern District of Missouri in the Nissan Rogue and the Dodge Journey.
7. On November 26, 2016, shortly after the Saks Fifth Avenue department store (the “store”) in Frontenac, Missouri, in the Eastern District of Missouri, opened for business, fourteen individuals including the Defendants ran into the store and proceeded directly to the Chanel boutique.
8. On or about November 26, 2016, fourteen individuals, including the Defendants successfully stole approximately 30 purses, mostly manufactured by Chanel, entered the Nissan Rogue and Dodge Journey and proceeded onto Interstate 64/40 toward Illinois. The stolen purses had a retail value of approximately \$115,000
9. In addition to the stolen purses, the fourteen individuals including the Defendants unsuccessfully attempted to steal approximately 10 purses with a retail value of approximately \$40,000.

10. On or about November 26, 2016, the Nissan Rogue and the Dodge Journey, occupied by the Defendants and others known and unknown, lead law enforcement on a high speed chase in central Illinois. The Dodge Journey was stopped and its occupants arrested near Litchfield, Illinois. The Nissan Rogue, in which the Defendants and others known and unknown were travelling successfully evaded law enforcement.
11. On or about November 26, 2016, the Nissan Rogue successfully returned to Chicago, Illinois and was observed parked at 5959 S. Carpenter St., Chicago, Illinois.
12. Between on or about November 26, 2016 and February 13, 2017, the Nissan Rogue was successfully hidden from Avis Rental Car Company and Chicago area law enforcement. The Nissan Rogue was eventually located by the Forest View, Illinois Police Department on February 13, 2017.

Offense Conduct

13. Between on or about October 27, 2016 and continuing through on or about February 13, 2017, in St. Louis County within the Eastern District of Missouri and elsewhere,

**ANTHONY HAYES, and
DEVONTE HOLLIDAY,**

the Defendants herein, and others known and unknown, did knowingly and intentionally conspire to commit an offense against the United States, to wit: Interstate Transportation of Stolen Property in violation of Title 18, United States Code Section 2314.

All in violation of Title 18, United States Code Section 371.

COUNT II – INTERSTATE TRANSPORTATION OF STOLEN PROPERTY

14. The allegations contained in Count I are hereby reallaged and incorporated by reference.

15. On or about November 26, 2016, within the Eastern District of Missouri and elsewhere,

ANTHONY HAYES,

the Defendant herein, did knowingly and intentionally transport stolen property from Missouri to Illinois, said property having a value of \$5,000 or more.

In violation of Title 18, United States Code Sections 2314 and 2.

COUNT III – INTERSTATE TRANSPORTATION OF STOLEN PROPERTY

16. The allegations contained in Count I are hereby reallaged and incorporated by reference.

17. On or about November 26, 2016, within the Eastern District of Missouri and elsewhere,

DEVONTE HOLLIDAY,

the Defendant herein, did knowingly and intentionally transport stolen property from Missouri to Illinois, said property having a value of \$5,000 or more.

In violation of Title 18, United States Code Sections 2314 and 2.

A TRUE BILL.

FOREPERSON

CARRIE COSTANTIN
Acting United States Attorney

THOMAS C. ALBUS, #46224MO
Assistant United States Attorney